

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

JUL 23 2015

U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHRISTOPHER ROE,

Defendant.

4:15CR346 AGF/NCC

INDICTMENT

COUNT I

The Grand Jury charges that:

At all times pertinent to the charges in this indictment:

1. Federal law defined the term

(a) "minor" to mean any person under the age of eighteen years (18 U.S.C. § 2256(1));

(b) "sexually explicit conduct" to mean actual or simulated--

(i) sexual intercourse, including genital-genital, anal-genital, oral-genital, oral-anal, whether between persons of the same or opposite sex,

(ii) bestiality,

(iii) masturbation,

(iv) sadistic or masochistic abuse, or

(v) lascivious exhibition of the genitals or pubic area of any person (18 U.S.C. §2256(2)(A));

(c) "computer" to mean an electronic, magnetic, optical, electrochemical or other high speed data processing device performing logical, arithmetic or storage functions, including any data storage facility or communications facility directly related to or operating in conjunction with such device. (18 U.S.C. §2256(6));

(d) "child pornography" to mean any visual depiction, including any photograph, film, video, picture, or computer or computer-generated image or picture, whether made or produced by electronic, mechanical, or other means, of sexually explicit conduct, where--

(A) the production of such visual depiction involves the use of a minor engaging in sexually explicit conduct; or

(C) such visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaging in sexually explicit conduct. (18 U.S.C. §2256(8)).

2. The "Internet" was, and is, a computer communications network using interstate and foreign lines to transmit data streams, including data streams used to store, transfer and receive graphic files.

3. Between on or about January 1, 2012, and on or about July 24, 2014, within the Eastern District of Missouri and elsewhere,

CHRISTOPHER ROE,

the Defendant herein, knowingly transported, using any means and facility of interstate and foreign commerce, that is the defendant transported graphic image files via the Internet which contained child pornography, including, but not limited to, one of the following:

1. "Untitled"- an image file sent to user "dannyboyyum" depicting a minor male sitting down in a lascivious display of his genitals; and
2. "Untitled"- an image file sent to user "dannyboyyum" depicting a minor male laying down with his shirt pulled up in a lascivious display of his genitals;

In violation of Title 18, United States Code, Section 2252A(a)(1).

COUNT II

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.

2. Between on or about January 1, 2012, and on or about July 24, 2014, in the Eastern District of Missouri, and elsewhere,

CHRISTOPHER ROE,

the Defendant herein, did knowingly receive, using any means and facility of interstate and foreign commerce, i.e., the Internet, graphic files containing child pornography including, but not limited to, the following:

1. "untitled"- an image file depicting parkerpie2299, a minor male, in a lascivious display of his genitals;
2. "untitled"- an image file received from "dannyboyyum" depicting a minor male standing up in a lascivious display of his genitals;
3. "untitled"- an image file received from "dannyboyyum" depicting a minor male kneeling on the floor in a lascivious display of his genitals;

4. "untitled"- an image file received from "dannyboyum" depicting a minor male laying down up in a lascivious display of his genitals and with his anus exposed;
5. "IMG_3578 (Attachment).MOV"- a video file received from Max Hammad depicting a minor male touching his genitals with his hand; and
6. "IMG_0402 (Attachment).MOV"- a video file received from Max Hammad depicting a minor male touching his genitals with his hand;

In violation of Title 18, United States Code, Section 2252A(a)(2).

COUNT III

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between on or about January 1, 2012, and on or about July 15, 2015, in the Eastern District of Missouri, and elsewhere,

CHRISTOPHER ROE,

the Defendant herein, did knowingly possess material that contained images of child pornography that was produced using materials that traveled in interstate and foreign commerce, to wit, Toshiba external hard drive, said Toshiba external hard drive having been produced outside Missouri and therefore having traveled in interstate and foreign commerce, and said Toshiba external hard drive contained child pornography, including but not limited to, the following:

1. "5Yo Cocksucker Opens Wide For Daddy's Thick Cock,"- a video file depicting a prepubescent minor performing oral sex on a male;
2. "6yo blond boy David and a hairy man," - a video file depicting a male having anal intercourse with a prepubescent minor male;
3. "7yoBOY," a video file depicting a male having anal intercourse with a prepubescent minor male;
4. "IMG_1018," a video file depicting a male performing oral sex on a prepubescent minor male; and
5. "Pthc_20132_25563_29992_12471_12519_12479_Cambrazil_001_-
_8Yo_and_10Yo_Boy_B," a video file depicting prepubescent minor males performing oral sex on each other.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

COUNT IV

The Grand Jury further charges that:

1. The allegations contained in paragraphs one and two of Count I of this Indictment are incorporated by reference as if fully set forth herein.
2. Between on or about January 1, 2012, and on or about July 15, 2015, in the Eastern District of Missouri, and elsewhere,

CHRISTOPHER ROE,

the Defendant herein, did knowingly possess material that contained images of child pornography that was produced using materials that traveled in interstate and foreign commerce,

to wit, a SD card, said SD card having been produced outside Missouri and therefore having traveled in interstate and foreign commerce, and said SD card contained child pornography, including but not limited to, the following:

1. "Untitled,"- an image file depicting a Z.O., a minor male, in a lascivious display of his genitals;
2. "Untitled," -an image file depicting a prepubescent minor male in a lascivious display of his genitals.

In violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL.

FOREPERSON

RICHARD G. CALLAHAN
United States Attorney

ERIN O. GRANGER, #53593MO
Assistant United States Attorney